

ORIGINAL

DEC 15 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES M. HATTER, CLERK
Deputy Clerk

UNITED STATES OF AMERICA : CRIMINAL INDICTMENT
v. : NO. 1:10-CR-516

DEVON SAMUELS, :
a/k/a Smokey :
MARK TOMLINSON, :
a/k/a Supa :
KEISHA JONES, :
a/k/a Platinum :

UNITED STATES OF AMERICA : CRIMINAL INDICTMENT
v. : NO. 1:10-CR-517

CARLTON FERGUSON, :
a/k/a Fergie :
DAHLIA MCLAREN, :
a/k/a Dahlia McLaren Ferguson :
DEVON SAMUELS, :
a/k/a Smokey :

UNITED STATES OF AMERICA : CRIMINAL INDICTMENT
v. : NO. 1:10-CR-521

JEROME BUSHAY, :
a/k/a Romey :
FNU LNU, :
a/k/a Otis :
CHRISTOPHER DIXON, :
a/k/a Yardman :
MARK TOMLINSON, :
a/k/a Supa :
ROSHAUN HOOD, :
a/k/a Shaun :
CURTIS HERNANDEZ, :
a/k/a Kurt Hernandez :
NIGEL EDWARDS, :

a/k/a Nigel the Barber	:
JERMAINE CAMPBELL,	:
a/k/a Fatman	:
RICARDO DUNCAN,	:
a/k/a Ricky	:
DAVE GRANT,	:
a/k/a David Clarke	:
a/k/a Scratchy	:
CHRISTOPHER WILLIAMS,	:
a/k/a Eric Washington	:
a/k/a Bobby	:
a/k/a Beagle	:
a/k/a Apachee	:
DAMIEN AARONS,	:
a/k/a Damage	:
FNU LNU,	:
a/k/a Fowley	:

APPLICATION FOR PROTECTIVE ORDER FOR DISCOVERY MATERIALS

The United States of America, by and through its counsel, Sally Quillian Yates, United States Attorney, Northern District of Georgia, and Jeffrey W. Davis, Assistant United States Attorney, pursuant to Federal Rule of Criminal Procedure 16(d), moves for a protective order to limit the above-listed defendants' use and dissemination of information provided in discovery.

In support of its petition, the United States submits as follows:

1. The discovery materials in this case are voluminous and include over 10,000 pages of financial records, thousand of intercepted telephones calls, and hundreds of immigration reports and records.

2. Many of these documents contain sensitive information, including, criminal history details, dates of birth, flight records, alienage records, home addresses, visa and passport numbers, financial records (including bank accounts numbers), and other personal identifying information.

3. Accordingly, and by this application, the United States requests that a protective order be issued to guard against the dissemination of confidential financial information and sensitive personal data.

4. In particular, the United States requests an order mandating that any discovery materials and all information included in the discovery materials (regardless of whether such materials are defined as discovery under Rule 16), which are provided by the Government to the defendants, shall not be further disseminated by the defendants or his/her counsel to any individuals, organizations, or other entities, other than:

- a. To members of the defense team (co-counsel, paralegals, investigators, litigation support personnel, the defendant, and secretarial staff);
- b. To any experts or consultants retained to assist in the preparation of the defense; and
- c. To counsel for any co-defendant (if any are included in the future).

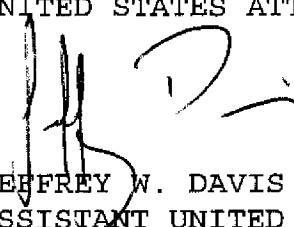
The Government further requests that all discovery is to be provided and used by each defendant and his counsel solely for the purpose of allowing the defendant to prepare his defense, and that each defendant, defense counsel, or members of the defense teams will not disseminate, disclose, or provide the discovery produced by the United States to anyone who is not necessary to the preparation of the defense.

WHEREFORE, the United States respectfully requests that the Court issue the protective order presented to the Court.

Dated: December 15, 2010.

Respectfully submitted,

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY


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